UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

MAJED KHALIL,

Plaintiff,

HON. LOUIS L. STANTON

v.

Case No. 1:21-cv-10248-LLS

FOX CORPORATION, et al.

Defendants.

ORAL ARGUMENT REQUESTED

FOX CORPORATION, FOX NEWS NETWORK LLC, AND LOU DOBBS' NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss the Complaint dated January 31, 2022, Defendants Fox Corporation, Fox News Network, LLC, and Lou Dobbs, by and through the undersigned counsel, will move this Court, before the Honorable Louis Stanton, United States District Judge, in Courtroom 1105 at the United States Courthouse for the Southern District of New York, 40 Foley Square, New York, NY 10007, at a date and time to be determined by the Court, for an Order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing the Complaint filed by Plaintiff Majed Khalil in the above-captioned action in its entirety and with prejudice and for other and further relief as the Court may deem just and proper.

Dated: January 31, 2022

PAUL D. CLEMENT ERIN E. MURPHY K. WINN ALLEN, P.C. DEVIN S. ANDERSON KIRKLAND & ELLIS LLP 1301 Pennsylvania Ave., N.W. Washington, D.C. 20004 (202) 389-5000

MARK R. FILIP, P.C. KIRKLAND & ELLIS LLP 300 North LaSalle Chicago, IL 60654 (312) 826-2000 Respectfully Submitted,

/s/ Robert W. Allen ROBERT W. ALLEN, P.C. KIRKLAND & ELLIS LLP 601 Lexington Ave. New York, NY 10022 (212) 446-4800 bob.allen@kirkland.com

Counsel for Defendants Fox Corporation, Fox News Network LLC, and Lou Dobbs

CERTIFICATE OF SERVICE

The foregoing Notice of Defendants' Motion to Dismiss was served electronically on all counsel of record in this matter via the Court's ECF system.

/s/Robert W. Allen Robert W. Allen